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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment to the Commission's	)	WT Docket No. 95-157
Rules Regarding a Plan for Sharing	)	RM-8643
the Costs of Microwave Relocation	)	

To: The Commission

REPLY COMMENTS

Pursuant to Section 1.415 of the Commission's Rules,[1] Alcatel Network Systems, Inc. ("ANS"),[2] by its attorney, hereby replies to certain comments on the above-captioned Notice of Proposed Rule Making ("NPRM"). In the NPRM, the Commission proposes establishing a plan for microwave facility relocation cost-sharing to facilitate clearance of the 2 GHz band for broadband personal communications services ("PCS").[3]

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[1]47 C.F.R. Section 1.415 (1995).

[2]ANS is a wholly-owned subsidiary of Alcatel Alsthom ("Alcatel"), one of the world's largest corporations (with annual sales in excess of $30 billion) and the world's largest manufacturer and supplier of telecommunications equipment. In particular, Alcatel is the world's largest independent manufacturer and supplier of microwave radios. Formerly Collins Radio and Rockwell International, ANS, with over $750 million in annual sales, is a world leader in manufacturing microwave and light wave transmission systems. ANS' equipment is used for a wide range of services, including short, medium and long-haul voice, video and data transmission. Its microwave customers include all the Bell Operating Companies, most major independent telephone companies, cellular operators, power and other utility companies, oil companies, railroads, industrial companies, and state and local government agencies.

[3]NPRM at paras. 1-2.

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Prompt adoption of cost-sharing rules is essential to PCS deployment. ANS appreciates the efforts made by the 2 GHz fixed point-to-point microwave service ("FS") users, PCS licensees, and the Commission to accommodate the needs of all affected interests. Thus, ANS generally supports the proposals in the NPRM.

Certain issues in the NPRM, however, require revision or clarification to ensure that the rules treat all parties fairly and truly serve the public interest. These issues, which include the appropriate interference standard for cost-sharing and the need to recognize adjacent channel interference, are addressed in reply comments filed contemporaneously herewith by the Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"). ANS supports TIA's position in these reply comments.

The most important issue requiring clarification is establishing a standard to calculate interference for purposes of determining cost sharing obligations. In the NPRM, the Commission proposes that this standard should be TIA's "Telecommunications Systems Bulletin No. 10-F, Interference Criteria for Microwave Systems" ("Bulletin 10-F"), which prescribes standards for implementing the new channel plan for the bands above 3 GHz and for establishing criteria regarding 2 GHz band PCS-to-microwave interference protection.[4]

Substantial support, among both FS and PCS interests, for the Commission's intended use of Bulletin 10-F (and its subsequent versions) exists in the record. For example, the Personal Communications Industry Association ("PCIA") states that Bulletin 10-F "is the best method for

[4]NPRM at para. 52. As detailed in TIA's comments (footnote 4), Bulletin 10-F is being updated as part of its ongoing standards process. Currently, the next version, Bulletin 10-G, is in draft. Once rules are adopted in this proceeding, the Bulletin should be referenced as "Bulletin 10-( )" since it is being constantly updated.

determining interference and can be applied in a relatively straightforward manner . . . ."[5] Such support is not surprising because Bulletin 10-F is the appropriate standard for determining PCS-to-microwave interference:

> In Bulletin 10-F, only one propagation model is set forth, which is a smoothed merging of the HATA model for close-end interferences with the NBS Tech Note 101 study on over-the-horizon losses. Such a model was selected after years of discussion and is widely accepted. It is conservative enough to cover all interference scenarios.[6]

A limited number of parties, however, request that alternative standards be used. For example, a group of PCS licensees, which negotiated their own cost-sharing agreement, recommend adoption of a "proximity threshold" formula.[7] ANS does not object to other standards provided that they are limited to determining interference only for cost-sharing purposes and not for controlling operations among PCS and FS systems. Pacific Bell agrees:

> [T]he Commission should make clear that the co-channel interference limitation relates only to the cost-sharing obligation. All PCS licensees remain obligated not to cause harmful interference to any microwave incumbent. This applies equally to co-channel and adjacent channel interference.[8]

The advocates of alternative standards also concur with this limitation, as AT&T declares that the "proximity threshold" will be used "for determining interference for purposes of cost-sharing . . . ."[9]

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[5]PCIA at 36. See also BellSouth at 16-18; The Southern Company at 8; Western Wireless Corporation at 4, 7-8; Pacific Bell Mobile Services ("Pacific Bell") at 5; American Petroleum Institute at 5-7; UTC at 15; U.S. AirWaves Inc. at 5; DCR Communications, Inc. at 6.

[6]TIA at 3. In its comments, Southwestern Bell Mobile Systems, Inc. ("SBMS") persists in its incorrect assertion that Bulletin 10-F "contains only microwave to microwave standards . . . ." SBMS at 6. The Commission recognizes that Bulletin 10-F "was developed to determine PCS-to-microwave interference . . . ." NPRM at para. 52. Indeed, it is incorporated into Part 24 as the standard for making such a determination. Id.

[7]See AT&T Wireless Services, Inc. ("AT&T") at 7-9; PCS PrimeCo, L.P. at 12-14; Sprint Telecommunications Venture at 24-26; GTE Service Corporation at 5.

[8]Pacific Bell at 5.

[9]AT&T at 2.

CONCLUSION

The proposals in the NPRM, as annotated in TIA's reply and herein, are appropriate and must be adopted quickly. Otherwise, deployment of PCS will be delayed further, depriving the public the availability of an important telecommunications service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply Comments will be sent via first class mail, postage prepaid, to the following parties on the 11th day of January, 1996.

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